

MARC M. ROSE, ESQ.
LICENSED IN TX & VA



January 5, 2022

VIA: ECF

The Honorable Alfred H. Bennett
U.S. District Court
Southern District of Texas
515 Rusk, Room 8631
Houston, Texas 77002

**Re: *Lorie Duff v. Frontier Airlines, Inc. et. al.*,
4:20-cv-03430
Deadline Extension to File Response
to Plaintiff's Motion for Leave to Amend**

To The Honorable Judge Bennett:

Plaintiff filed an Opposed Motion for Leave to File a Second Amended Complaint (Doc. Nos. 32 and 33) and a Motion to Dismiss Defendant DAL Global Services, Inc. The Motion Docket Date for Defendants to file responses was set for January 5, 2022. Defense counsel for ABM Aviation, Inc. conferred with Mr. Kevin Forsberg, Plaintiff's counsel via e-mail on January 3, 2022, requesting a seven-day (7) extension to reply to the Opposed Motion for Leave to File Second Amended Complaint (Doc. No. 32) and Motion to Dismiss DAL Global Services, Inc. (Doc. No. 33). Mr. Forsberg agreed to extend the deadline for Defendants to file responses to **January 12, 2022**. We ask that the Court take no action on Plaintiff's Motions until responses are filed after January 12, 2022.

Respectfully submitted,

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